

EXHIBIT F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

DECLARATION OF FAMILIAL RELATIONSHIP

I, Carlene Wynn, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Carlene Wynn. My mother, Lelia Mae Wynn, was an aunt of Peggie Maxine Hurt, who died on September 11, 2001 when the Pentagon was attacked in conjunction with the attack on the World Trade Center in New York. My mother died May 21, 2008. I am the administrator of my mother's estate.

2. For the reasons set forth below, I respectfully request that my mother should be deemed to have been during Peggie's life an immediate family member entitled to be compensated financially by the defendants for Peggie's death.

3. The Hurt family is an extended family that has resided in and around Kenbridge, Virginia, for generations. Kenbridge is a small town, with a population, according to Wikipedia, of about 1200, and not only did Peggie live there with her (and my) grandparents, Hunter and Lelia Ann Hurt, but our aunts Katherine Wynn, Dorothy Coles, and Edith Harris lived in Kenbridge as well. My mother and I lived in Victoria, Virginia, another small town (1700 hundred people according to Wikipedia) just 5 miles from Kenbridge. So the entire family could, and did, see each other on nearly a daily basis.

4. Peggie was always close to her Aunts and cousins. Even after she left Kenbridge to go to college and to work in Northern Virginia, she was home every other weekend, like clockwork. The family sung together (The Hurt Family). What one Aunt knew ALL Aunts knew because she talked to them. What one Cousin knew ALL of us knew because we all talked ALL the time. We all grew up together. If I felt my Mom wasn't giving me the answer I wanted I just went Aunt by Aunt and asked them the same question looking for a BETTER answer (it didn't work but a good try). That's how close we all were and are now. Peggie let all her Aunts know everything she did.

5. Peggie and I were particularly close because she became an accountant for the US Army and I was employed with the Virginia Army National Guard where I am a Line of Duty Investigations Administrator. In light of our mutual decisions to serve our country's military, it was particularly sad and ironic that Peggie died just two weeks after she was assigned to the Pentagon; I think because of our positions with the military her death affected me and my mother perhaps even more than the other aunts.

6. My mother applied to the Victims' Compensation Fund as an immediate family member and in 2004 was awarded \$96,737.03, which I understand constitutes a determination by the Fund that she was a member of Peggie's immediate family who was entitled to a share of the economic damages incurred by Peggie's death.

7. After my mother applied to the Victims' Compensation Fund, the Special Master scheduled a hearing, or perhaps more than one hearing, to determine whether Peggie's aunts were entitled to an award. I actually attended a hearing, and I remember my mother and other aunts testifying to how they were instrumental in Peggie's upbringing, and particularly that her father Arthur Harris played no role in Peggie's life. I was incensed that Mr. Harris seemed to

be trying to persuade the Special Master that he, and not the aunts, were Peggie's significant family. I was both relieved and pleased when the Special Master sent letters to each aunt telling them they were to share in an award for the injury they suffered by Peggie's death in a Terrorist attack, and I learned that Mr. Harris had only been given what he was entitled to under Virginia law as Peggie's biological parent.

8. The Special Master of the Victims' Compensation Fund recognized that in the Hurt family, the true "parents" were all the aunts, and the true "siblings" were all the cousins. I hope that this Court will recognize that the aunts are entitled to additional compensation from the defendants here, who enabled this vicious attack to happen and who took Peggie from all of us.

Executed on: 13 August 2019

Name (Signature): Carlene Wynn

Name (Print): Carlene Wynn